

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ZACHARY KNOTTS and LINDSAY
KNOTTS,

Plaintiffs,

v.

CITY OF CUYAHOGA FALLS, DYLAN
PARATORE, in his individual and official
capacities, and BRADFORD DOBNEY in his
individual and official capacities,

Defendants.

Case No. 5:25-cv-01120

Judge John R. Adams

**DECLARATION IN SUPPORT OF MOTION TO ADMIT COUNSEL
STUART J. ROTH *PRO HAC VICE***

Pursuant to 28 U.S.C. § 1746, I state the following:

1. I am an attorney with the firm THE AMERICAN CENTER FOR LAW & JUSTICE.
2. I am an active member of the Bar of the District of Columbia in good standing.
3. I submit this declaration in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. I have never been convicted of a felony.
6. I have not been censured, suspended, disbarred, or denied admission or readmission by any court.
7. Wherefore, your declarant respectfully submits that he be permitted to appear as counsel *pro hac vice* in case 5:25-cv-01120 for Plaintiffs Zackary Knotts and Lindsay Knotts.
8. I verify under penalty of perjury under the laws of the United States of America that the factual statements in this Declaration concerning myself, my activities, and my intentions are true and correct pursuant to 28 U.S.C. § 1746.

Executed on 6/4/2025,

Signed by:

Stuart J. Roth

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Stuart J. Roth